

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. <b>18-21</b> Erie
	)	
MARK JOSEPH BRETZ	)	(18 U.S.C. §§ 2252(a)(2), 2252(b)(1)
	)	and 875(d))

**INDICTMENT**

**COUNT ONE**

The grand jury charges:

From in and around June 2015 to in and around June 2018, in the Western District of Pennsylvania, the defendant, MARK JOSEPH BRETZ, did knowingly receive visual depictions of a minor that had been shipped and transported in interstate commerce, specifically by computer, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**FILED**

JUL 10 2018

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WEST. DIST. OF PENNSYLVANIA

**COUNT TWO**

The grand jury further charges:

From in and around April 2018, to in and around May 2018, in the Western District of Pennsylvania and elsewhere, the defendant, MARK JOSEPH BRETZ, did, with the intent to extort from any person a thing of value, transmit in interstate and foreign commerce any communication containing any threat to injure the reputation of the addressee, to wit, the defendant, MARK JOSEPH BRETZ, did threaten to injure the reputation of R.M. by publicly posting or sending to other individuals sexually explicit or sexually suggestive images of R.M. that the defendant claimed to possess, in order to extort sexually explicit and suggestive images from R.M.

In violation of Title 18, United States Code, Section 875(d).

**COUNT THREE**

The grand jury further charges:

In and around November 2017, in the Western District of Pennsylvania and elsewhere, the defendant, MARK JOSEPH BRETZ, did, with the intent to extort from any person a thing of value, transmit in interstate and foreign commerce any communication containing any threat to injure the reputation of the addressee, to wit, the defendant, MARK JOSEPH BRETZ, did threaten to injure the reputation of T.F. by publicly posting or sending to other individuals sexually explicit or sexually suggestive images of T.F. that the defendant claimed to possess, in order to extort sexually explicit and suggestive images from T.F.

In violation of Title 18, United States Code, Section 875(d).

**COUNT FOUR**

The grand jury further charges:

In and around December 2017, in the Western District of Pennsylvania and elsewhere, the defendant, MARK JOSEPH BRETZ, did, with the intent to extort from any person a thing of value, transmit in interstate and foreign commerce any communication containing any threat to injure the reputation of the addressee, to wit, the defendant, MARK JOSEPH BRETZ, did threaten to injure the reputation of T.L. by publicly posting or sending to other individuals sexually explicit or sexually suggestive images of T.L. that the defendant claimed to possess, in order to extort sexually explicit and suggestive images from T.L.

In violation of Title 18, United States Code, Section 875(d).

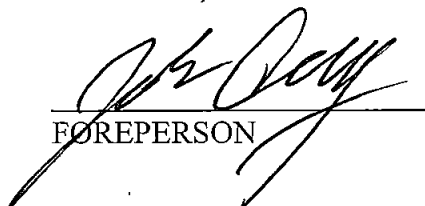
**FORFEITURE ALLEGATIONS**

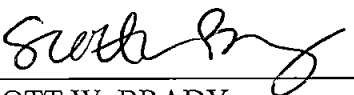
1. The grand jury re-alleges and incorporates by reference the allegations contained in Counts One through Four of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).

2. As a result of the commission of the violations charged in Counts One through Four of this Indictment, the defendant, MARK JOSEPH BRETZ did use the following to commit or to promote the commission of said violations:

- a) HP Pavilion computer, model HMG41JI
- b) 2 Seagate external hard drives
- c) Toshiba external hard drive
- d) 2 thumb drives
- e) Grey laptop computer, model MS-1010
- f) LG cell phone V2O
- g) HP Pavilion laptop computer G6
- h) 2 Sandisk SD cards

A True Bill,

  
FOREPERSON

  
SCOTT W. BRADY  
United States Attorney  
PA ID No. 88352